



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

112206

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

In Reply Refer To: 3HW12

Mr. James A. Ogden  
Alloy Rods Corporation  
Wilson Avenue  
P.O. Box 517  
Hanover, PA 17331

Re: Keystone Sanitation Company Site  
Adams County, Pennsylvania  
(Location Map in Enclosure A)

Dear Mr. Ogden:

The United States Environmental Protection Agency ("EPA") has expended public funds to investigate a release or a threat of a release of hazardous substances at the Keystone Sanitation Landfill. This letter notifies you that EPA may spend additional public funds on actions to further investigate and control such releases. Unless EPA determines that a responsible party will properly perform such actions, EPA intends to do so pursuant to Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. 9601 as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Public Law 99-449, 100 Stat. 1613 and the National Contingency Plan (NCP), 40 C.F.R. § 300.68. Specifically, the EPA intends to conduct or oversee a Remedial Investigation and Feasibility Study at the above referenced site ("Site").

Responsible parties under CERCLA include current owners and operators of the Site or facility, past owners and operators at the time of disposal of hazardous substances, as well as persons who generated the hazardous substances or were involved in the transport, treatment, or disposal of hazardous substances at the Site. EPA has information indicating that your company is a generator of hazardous substances that were disposed at the Site. Specifically, EPA has information indicating that Alloy Rods, formerly Chemetron Corp., disposed of waste rod coatings and/or line cutter scum at the Keystone Sanitation Landfill. These wastes contained hazardous substances including cadmium, chromium, barium, mercury and lead. Supporting documentation for such information is enclosed (Enclosure B).

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This section is written as a response to your letter of March 14, 1986 to Tim Travers of the CERCLA Remedial Enforcement Section of the U.S. Environmental Protection Agency (EPA) regarding Alloy Rods Corporation's use of the Keystone Landfill. The information you provided in your letter, while pertinent, appears incomplete. A copy of your letter is enclosed for your information (Enclosure G).

Your response indicated that Alloy Rods Corporation manufactures welding electrodes and produces several potentially hazardous wastes which are disposed of in various ways, including disposal via Envirite and Chem-Clear. In your response you indicated that "waste rod coating" is a sludge which is disposed of at the Keystone Landfill in Adams County, Pennsylvania. Your response also indicated that Alloy Rods Corporation maintains a file containing recent invoices from Keystone Sanitation.

EPA presently has information indicating that Alloy Rods Corporation was using the Keystone Landfill for the disposal of "sludge" as early as 1977 under the name Chemetron Corporation. Chemical analyses of line cutter scum indicate that this waste contains high levels of some hazardous substances including cadmium, chromium, barium, mercury, and lead. EPA also has information indicating that a metal hydroxide sludge was used for "land application" from 1971-1977.

EPA now requires that you respond within fifteen (15) days to this request and supply information and documentation concerning:

1. the time period of operation of your business including information concerning company mergers, company name changes, company relocations and any parent company or subsidiary companies;
2. a description of maintenance procedures and maintenance materials used by your company;
3. the nature of any raw material, product or waste used, or generated, by your company including Material Safety Data Sheets (MSDS), chemical analyses, and general material descriptions;
4. the method and location of waste and hazardous substance disposal utilized by your company during the years of Keystone Landfill operation (1969-1987), including manifests and information stating how these wastes were transported and where these wastes were sent if not to the Keystone Landfill;
5. the time period which Alloy Rods has contracted with Chem-Clear;
6. the time period which Alloy Rods has contracted with Envirite; and
7. the disposal location of metal hydroxide sludge after 1977.

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